

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DORIS TSE, Ph.D.,

Plaintiff,

-against-

NEW YORK UNIVERSITY,

Defendant.

10-CV-7207 (DAB)

**NOTICE OF MOTION *IN LIMINE***

PLEASE TAKE NOTICE THAT, upon the Defendant's Memorandum Of Law In Support Of Its Motion *In Limine* To Exclude Economic Damages, Reinstatement And Any Argument That Plaintiff Was Qualified For Another Job, and upon all the pleadings and proceedings herein, defendant New York University ("NYU") will move this Court before The Honorable Deborah A. Batts, United States District Judge, Southern District of New York, United States Courthouse, 500 Pearl Street, Courtroom 24B, New York, New York 10007, on a date and at a time to be designated by the Court, for an order granting NYU's motion *in limine* to preclude plaintiff from seeking back pay, front pay or reinstatement at trial, as well as to prevent her from arguing at trial that she was qualified to assume any alleged vacant jobs at NYU, and for such other relief as the Court may deem just and proper.

Dated: New York, New York  
May 20, 2016

Respectfully submitted,

CERASIA & DEL REY-CONE LLP

By s/ Edward Cerasia II  
Edward Cerasia II  
150 Broadway, Suite 1517  
New York, New York 10038  
646.525.4231  
*Attorneys for Defendant*